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April 22, 2019

VIA FACSIMILE (267-299-5058)

Honorable Joel H. Slomsky
United States District Court
For the Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street – Room 13614
Philadelphia, PA 19106

RE: Strike 3 Holdings, LLC v. George Bordley
U.S.D.C., E.D.Pa. No. 2:18-cv-00868-JHS

Dear Judge Slomsky:

I submit this correspondence to respectfully request a two-month extension of the deadlines currently in place regarding the above-referenced matter. The parties are still actively engaged in the exchange of discovery and anticipate that it will take longer than the timeframe currently set forth by the Court to achieve the completion of discovery. This is because there was delay in production of Defendant's computer hard drives (some of which still have not yet been forensically imaged due to technical issues that arose during the production meeting). In addition, although Plaintiff's experts have already located evidence of Defendant's BitTorrent use, Plaintiff's expert still requires additional time to review all the data contained in each of the hard drives and compose an expert report regarding same. Further, the results of expert examination will be the subject of deposition questions. Therefore, Plaintiff cannot depose Defendant until after production and examination of each hard drive. Per your staff's prior instruction, the proposed new deadlines are set forth in the attached Proposed Order. I have attempted to confer with Joseph Bahgat, Esquire, attorney for Defendant, George Bordley via e-mail and telephone, but I have been unable to reach him. I will notify the Court after I hear from Mr. Bahgat, and will advise if Defendant opposes the relief requested herein.

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The parties hereby Plaintiff respectfully request that the case management deadline be extended as follows.

<u>Deadline</u>	<u>Date (Per Docket No. 16)</u>	<u>Proposed Extension</u>
Discovery	April 22, 2019	June 28, 2019
Mediation before Magistrate Judge Carol Wells	April 30, 2019 at 10:30 a.m.	June 28, 2019
Rebuttal Expert Reports Due	June 17, 2019	August 16, 2019
Expert Report (Federal Rule of Civil Procedure 26(a)(2)(B))	June 3, 2019	August 2, 2019
Deadline to Depose Experts	July 1, 2019	August 30, 2019
Dispositive and Daubert Motions	July 29, 2019	September 27, 2019
Service of marked Trial Exhibits See Dkt. 16, ¶7)	August 12, 2019	October 11, 2019
Responses to Dispositive and Daubert Motions	August 19, 2019	October 18, 2019
Deadline to file Pretrial Memoranda	August 26, 2019	October 25, 2019
Deadline to file Motions in Limine and other Pretrial Motions	September 9, 2019	November 8, 2019
Deposition Objections	September 9, 2019	November 8, 2019
Deadline to file Responses to Motions in Limine and other Pretrial Motions	September 16, 2019	November 15, 2019
File Joint Proposed Jury Instructions	September 16, 2019	November 15, 2019
Voir Dire Questions	September 16, 2019	November 15, 2019
Final Pretrial Conference	September 23, 2019 at 2:30 p.m. in Chambers (Room 13614)	November 22, 2019
Trial	September 30, 2019 at 9:30 a.m. in Courtroom 13A	November 29, 2019



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I thank Your Honor in advance for your consideration of this request. If you have any questions or comments, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read 'Andrew W. Bonekemper'.

Andrew W. Bonekemper

/am

cc: Joseph Bahgat, Esquire (*via email*)